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Attorneys for Defendant RAMON DESAGE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

| | | |
|---------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | Case No.: 2:13-cr-00039-JAD-VCF |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| RAMON DESAGE, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

UNOPPOSED MOTION TO TRAVEL AND PROPOSED ORDER

Comes now, Defendant Ramon Desage, by and through his counsel, Richard A. Wright, Esquire and Richard B. Herman, Esquire, and hereby moves this Court for permission to travel from Las Vegas, Nevada to Los Angeles, California on February 23, 2015 and returning on February 24, 2015. Mr. Desage further requests permission to travel to Miami, Florida on February 26, 2015 and returning on February 28, 2015. Defendant will be traveling to Los Angeles for a meeting with an attorney and to Miami for a prospective business venture. While in Los Angeles, Mr. Desage, will

1 be staying at the Hyatt Regency Century Plaza, 2025 Avenue of the Stars, Los Angeles, California.
2 While in Miami, Mr. Desage will be staying at The Ritz Carlton, South Beach, 1 Lincoln Road,
3 Miami Beach, Florida.
4

5 On February 5, 2015, Richard B. Herman, Counsel for Mr. Desage, personally discussed this
6 request with Pre-Trial Services Officer Jaime Stroup, who advises he consents to this travel request.
7 Mr. Herman will provide Officer Stroup with Mr. Desage's travel itinerary and hotel information.
8 Mr. Desage will continue with electronic monitoring and will abide by all other bail conditions.
9 Upon his return to Las Vegas from Los Angeles on February 24, 2015 and his return from Miami
10 on February 28, 2015, Mr. Desage will give a courtesy call to Officer Stroup.
11

12 Counsel for Mr. Desage has discussed this request with Assistant United States Attorney
13 Gregory Damm, who has no opposition to it.
14

15 DATED this 10th day of February 2015.

16 Respectfully submitted:

17 BY /s/ Richard A. Wright
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19 300 S. Fourth Street
20 Suite 701
21 Las Vegas, NV 89101
22 Telephone: (702) 382-4004
23 Attorney for Defendant, Ramon Desage

24 BY /s/ Richard B. Herman
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26 New York Bar No. 1898758
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Attorney for Defendant, Ramon Desage

ORDER

This matter having come before the Court on the unopposed motion of Defendant Ramon Desage, and good cause appearing, Defendant's Motion for Permission to Travel to Los Angeles, California on February 23, 2015 and returning February 24, 2014, as well as Defendant's Motion for Permission to Travel to Miami, Florida on February 26, 2015 and returning on February 28, 2015 are **GRANTED**.


HONORABLE PEGGY A. LEEN

Dated: February 15, 2015

Respectfully submitted by:

WRIGHT STANISH & WINCKLER

/s/ Richard A. Wright
RICHARD A. WRIGHT

RICHARD B. HERMAN, P.C.

/s/ Richard B. Herman
RICHARD B. HERMAN